



Since 1990, NYLAG has provided free civil legal services to New Yorkers who cannot afford private attorneys.

May 13, 2020

Honorable Vincent S. Broderick  
United States District Judge  
Thurgood Marshall United States Courthouse  
70 Foley Square  
New York, NY 10007

Re: Barros v. National Railroad Passenger Corp., d/b/a/Amtrak, 18-cv-3394 (VSB)(SLC)

Dear Judge Broderick,

New York Legal Assistance Group, Clinic for Pro Se Litigants represents plaintiff, Megan Barros for the limited purpose of settlement. I write to provide the court with a status update on settlement, and to request that the fee dispute with plaintiff's former counsel be referred for a settlement conference.

Defendant, National Railroad Passenger Corp. ("Amtrak") and Ms. Barros have entered into an agreement in principle to resolve all issues in the complaint. Amtrak's counsel Ron Joseph of Landman Corsi Ballaine & Ford P.C. and I are in the process of preparing the settlement documents.

Ms. Barros' former counsel Marc Thompson withdrew his representation pursuant to motion and supporting affidavit in July and August 2019 (ECF#27, 30), which motion was granted by Your Honor on August 26, 2019 (ECF #31). In connection with the settlement, I contacted Mr. Thompson to determine if he was asserting a charging lien and if so, the amount he demanded. In the communications that followed, a fee dispute arose between Mr. Thompson and Ms. Barros. Plaintiff respectfully requests that this fee dispute be referred to Magistrate Judge Sarah L. Cave for a settlement conference. Ms. Barros' wants to finalize the settlement agreement but is unable to while this fee dispute exists.

Respectfully submitted,

*Susanne Keane*

Susanne Toes Keane